

8 January, 2019

Dear NH DES,

I have spent some time looking at the presentations and comments regarding the proposed revised Wetland Rules.

I am a resident of Stratford, in Coös County, and a member of our newly-formed Conservation Commission, but am writing this as a private citizen. I have found the rules themselves to be difficult to completely understand, so I am relying on synopses, the on-line version of the presentation given in Lancaster, comments by NHACC, and other groups and individuals posted on your website. So please forgive me if I have misunderstood anything.

The State of NH underfunds many important services, unfortunately. Ideally that would be addressed by some kind of progressive/equitable taxation system, but that seems to be a political non-starter. I see why DES would like to streamline some operations to be able to function efficiently within tight budgets and low manpower. Actually, my concerns have mostly to do *with* the ‘streamlined/improved process’ aspects of the proposals.

Changing the time frames: reducing times from 10 to 5 days for PBNs, 75 to 5 days for agriculture and Standard minimum impact projects, and expedited projects from 30 to 10 days. Surely this is unrealistic; you have little resources, and yet you will be required to do things faster. What will suffer?

Furthermore, I feel that excluding Conservation Commissions and Abutter notice from PBNs is counter-productive. Community residents know their towns; aerial maps don’t tell a whole story. Within my neighborhood I can find many small wetlands and vernal pools, for example. Conservation Commissions perform the vital role of ‘boots on the ground’ that actually enhance the work of DES and provide ‘streamlining’ and ‘improved process’.

It also seems that you have included more types of areas in PBNs and less in your ‘priority resource areas’; why is that?

I feel all this streamlining and expediting is really just causing a 'death by a thousand cuts' scenario, where many small areas are not adequately assessed and protected, and the effects will cascade. We all know that everything is interconnected. Please don't weaken the bonds by claims of increased efficiency.

Sincerely,

Rachel O'Meara
Stratford, NH